NEW HORIZON COOPERATIVE

1971 Iowa Ave
Britt. IA 50423

December 17, 2004

Division of Dockets Management
5630 Fishers Lane
Room 1061
Rockville. MD 20852

Re. Docket Nos. 1996P-0418.1997P-0197,1998P-0203 and 2000N-0504, "Prevention of Salmonella Enteriditis in Shell Eggs During Production"

Greetings

I manage a farmer-owned 501 cooperative with a 900,000 bird capacity in North Central Iowa   After reading the proposal I have a few comments

We are and have been adherents of the United Egg Producers Animal Husbandry guidelines since our inception in 2000   We feel these guidelines are well thought out and totally achievable. We feel that adding on to these guidelines will not appreciably make eggs safer for consumption.

All of our started pullets arrive at our complex pre-vaccinated for SE. As beleaguered as we are with other real threats such as END and avian influenza it gives us no little comfort to know that, with vaccination, SE is not one of our major concerns   Also, as our flocks are vaccinated for SE, we feel environmental SE testing is needed only immediately prior to de-housing

Following de-housing, we blow down and dry clean our barns. We do not 'wet clean' any of our facilities as this practice decreases the practical life of the machinery in the barns and leaves damp areas that could hold and incubate other bacteria
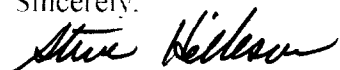
We need to double molt all our flocks to maximize our profit potential   Research has shown that molted hens do not shed more SE than non-molted hens   With a sound SE vaccination program, this question should be moot anyway

If the FDA is serious about food safety then there should be no exemption in the proposal for smaller flock sizes All egg produces should be treated alike.

When viewing the entire egg industry. we realize we contribute an insignificant portion of the eggs into the food system, but we like to think our thoughts would be taken as seriously as those of the larger producers.

Thank you

Sincerely.

Steve Hilleson
Manager New Horizon Cooperative

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